

PHILLIP A. TALBERT  
United States Attorney  
JUSTIN J. GILIO  
Assistant United States Attorney  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
PANTALION LOPEZ-ZAVALA,  
  
Defendant.

CASE NO. 1:23-CR-00153-JLT-SKO

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER

DATE: 9/16/2024  
TIME: 9:00 am

**BACKGROUND**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for change of plea on 9/16/2024.
2. By this stipulation, defendant now moves to continue the change of plea hearing to 11/4/2024, and to exclude time between 9/16/2024, and 11/4/2024, under 18 U.S.C. § 3161(h)(7)(A), B (i), (iv).
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes recorded communications, cellphone extractions, investigative reports, and various media evidence.
  - b) Counsel for defendant desires additional time consult with her client, prepare for

1 the change of plea hearing, and conduct independent investigation. The government has  
2 finalized a plea offer and the defendant needs time to review that and prepare for the change of  
3 plea hearing.

4 c) Counsel for defendant believes that failure to grant the above-requested  
5 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
6 into account the exercise of due diligence.

7 d) The government does not object to the continuance.

8 e) Based on the above-stated findings, the ends of justice served by continuing the  
9 case as requested outweigh the interest of the public and the defendant in a trial within the  
10 original date prescribed by the Speedy Trial Act.

11 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
12 et seq., within which trial must commence, the time period of 9/16/2024 to 11/4/2024, inclusive,  
13 is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(i) and (iv) because failure to  
14 grant the continuance would deny the defendant reasonable time to obtain counsel, would  
15 unreasonably deny the defendant or the Government continuity of counsel, or would deny  
16 counsel for the defendant or the attorney for the Government the reasonable time necessary for  
17 effective preparation, taking into account the exercise of due diligence.

18 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
19 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
20 must commence.

21 IT IS SO STIPULATED.

22  
23  
24 Dated: September 5, 2024

PHILLIP A. TALBERT  
United States Attorney

25  
26 /s/ JUSTIN J. GILIO  
JUSTIN J. GILIO  
27 Assistant United States Attorney  
28

1 Dated: September 5, 2024

/s/ Alekxia Torres Stallings

Alekxia Torres Stallings

Counsel for Defendant

Pantalion Lopez-Zavala

7 **ORDER**

8 IT IS SO FOUND.

9  
10 IT IS SO ORDERED.

11 Dated: **September 10, 2024**

  
UNITED STATES DISTRICT JUDGE